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6 || Attorneys for Plaintiff
WALTER DELSON

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 WALTER DELSON,
12 Plaintiff

13 | Page

14 CYCT MANAGEMENT GROUP,
15 INC.; KINGS TRIUMPH, LLC;
16 LINDA YU- LING TU TRUST;
LALEH HERAVI dba Fondue Fred;
and DOES 1-20, Inclusive.

17 || Defendants.

CASE NO. C11-03781 MEJ
Civil Rights

**STIPULATION AND [PROPOSED]
ORDER FOR DISMISSAL WITH
PREJUDICE**

Pursuant to FRCP Rule 41(a)(2)

19 Plaintiff WALTER DELSON and Defendants CYCT MANAGEMENT
20 GROUP, INC., KINGS TRIUMPH, LLC, and the LINDA YU- LING TU TRUST
21 hereby jointly stipulate and request through their respective attorneys of record
22 that the Court dismiss this case with prejudice pursuant to FRCP 41(a)(2). This
23 request and stipulation is based on the following good cause:

- 24 1. Whereas the only remaining issue in this case is payment of plaintiff's
25 attorney fees in the amount of \$81,851.50 as Ordered by the Court on April
26 30, 2013 (Docket no. 45);
27 2. Whereas defendants CYCT Management Group, Inc., King's Triumph,
28 LLC, and Linda Lu-Ling Tu Trust have now paid this amount in full;

1 3. Whereas the parties have agreed to injunctive relief for barrier removal
2 pursuant to the Consent Decree entered on June 11, 2012, (Docket no 21),
3 and under which this Court will continue to have jurisdiction to enforce its
4 provisions;

9 || IT IS SO STIPULATED.

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11 || Dated: June 18, 2013

LAW OFFICES OF PAUL L. REIN

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Dated: June 18, 2013

LOWBALL & LYNN

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/s/Paul L. Rein
By PAUL L. REIN
Attorneys for Plaintiff
WALTER DELSON

LOW BALL & LYNCH

/s/Laura Flynn
By LAURA FLYNN, Esq.
Attorneys for Defendants
CYCT MANAGEMENT C
KINGS TRIUMPH, LLC;
LING TU TRUST

ORDER

Good cause having been shown, this case is dismissed with prejudice pursuant to FRCP 41(a)(2) as to defendants CYCT MANAGEMENT GROUP, INC.; KINGS TRIUMPH, LLC; and LINDA YU- LING TU TRUST.

IT IS SO ORDERED.

Dated: June 20, 2013



MARIA-ELENA JAMES
United States Chief Magistrate Judge

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STIPULATION AND [PROPOSED] ORDER
FOR DISMISSAL WITH PREJUDICE
CASE NO. C11-03781 MEJ